Copy of Lauckhart Oral Comments made at ColumbiaGrid/WUTC Special Presentation July 31, 2017

1:30 PM to 3:30 PM

- 1) Did ColumbiaGrid perform load flow studies that show the need for Energize Eastside? We don't thinks so. But the ColumbiaGrid 2017 System Assessment suggests that ColumbiaGrid ran load flow studies that show the need for Energize Eastside. If so, we would very much like to see those studies to see how ColumbiaGrid might have shown the need for Energize Eastside without using bad modeling assumptions. I have provided comments/questions to ColumbiaGrid that address that and related questions. I look forward to seeing ColumbiaGrid's responses to the comments/questions I sent them. Those comments/questions have been provided for the record in this WUTC proceeding Docket No. 170791. [It is clear to us that the PSE/Quanta load flow study allegedly showing the need for Energize Eastside was done with bad modeling assumptions.]
- 2) One of the big questions relates to whether or not there is a **Firm** Requirement for BPA or some US Entity to deliver 1,350 MW of Treaty Entitlement Power to the Canada border.
 - a. <u>PSE has stated that ColumbiaGrid requires PSE to include a delivery of 1,350 MW of</u> <u>Entitlement Power to the Canadian border when PSE studies the local area transmission</u> <u>needs on the PSE system</u>. Of course, ColumbiaGrid does not have the authority to require PSE to build local transmission to cause increased capability to deliver Treaty power to the Canada Border.
 - b. The ColumbiaGrid Draft 2017 System Assessment states that there is a 1,350 MW
 Canadian Entitlement <u>South to North commitment</u> to deliver power at Blaine and
 Nelway. But ColumbiaGrid has provided no evidence that such a commitment exists.
 - c. <u>I have also written ColumbiaGrid providing evidence that demonstrates from Treaty</u> <u>documents that such a Firm Commitment does not exist</u>. <u>That writing has been</u> <u>provided for the record in this WUTC proceeding Docket No. 170791</u>. ColumbiaGrid needs to correct its erroneous statement in the ColumbiaGrid 2017 System Assessment (and anywhere else it makes the statement) that there is a 1,350 MW Canadian Entitlement <u>South to North commitment</u> to deliver power to the Canadian Border. <u>I</u> <u>look forward to those corrections being made.</u>
- 3) It is one thing for ColumbiaGrid to test to assure that Energize Eastside (a purely local project) does not adversely impact another utility. It is quite another thing for ColumbiaGrid to tell PSE that their Energize Eastside project needs to help BPA increase its ability to deliver Canadian Entitlement power to the Canadian border. Note:
 - a. ColumbiaGrid does not have that kind of authority
 - b. <u>There is no Firm Commitment for PSE to deliver Canadian Entitlement power to the</u> <u>Canadian border. Why would PSE customers need to pay to help BPA meet an</u> <u>obligation to deliver Canadian Entitlement power to the Canadian border?</u>
 - c. <u>Even more telling...there is no Firm Commitment that BPA (or any other United States</u> <u>Entity) has to deliver Canadian Entitlement power to the Canadian border.</u>
 - d. <u>And even further telling...We know that the grid cannot deliver 1,350 MW to the</u> <u>Canadian border under heavy winter conditions in 2017...before Energize Eastside is</u> <u>built (or after Energize Eastside is built for that matter)..</u>
- 4) I have indicated a willingness to meet with ColumbiaGrid to go over my several comments/questions and evidence. ColumbiaGrid has not yet accepted my invitation.